

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
ALBANY DIVISION

PERMANENT GENERAL  
ASSURANCE CORPORATION OF  
OHIO,

Plaintiff,

v.

DANIEL MARK MINICK,  
MARK MINICK, MINICK  
INTERIORS, INC., PROGRESSIVE  
MOUNTAIN INSURANCE  
COMPANY, THE ESTATE OF  
MICHAEL THOMAS MORRIS,  
LYNTON GODWIN, and  
FREDERICK UPDIKE,

Defendants.

Civil Action File No.:  
1:22-CV-00197-LAG

**STIPULATION OF PROGRESSIVE MOUNTAIN INSURANCE  
COMPANY**

COMES NOW, Respondent Progressive Mountain Insurance Company (hereinafter “Progressive”), by and through its undersigned counsel, and hereby waives any and all defenses to Petitioner’s allegation asserted in the Petition for Declaratory Judgment. Respondent Progressive stipulates that it will be bound by this Court’s determination with respect to the issues raised in the Petition.

In consideration for the foregoing, Progressive and Petitioner have consented to dismiss Respondent Progressive from this action and are filing a Consent Motion to Dismiss Fewer Than All Respondents contemporaneously herewith.

Respectfully submitted, this 18th day of January, 2023

LUEDER, LARKIN & HUNTER LLC

/s/ Samuel H. Sabulis

SAMUEL H. SABULIS

State Bar No. 339532

JENNIFER L. PRIDGEON

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*Attorneys for Progressive*

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**CERTIFICATION OF COMPLIANCE**

The Undersigned Counsel hereby certifies that the foregoing has been prepared using Times New Roman 14-Point Font, as approved in LR 5.1C.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served this 18th day of January, 2023, upon all attorneys to this matter by filing with the Court's CM/ECF system, which will automatically e-mail notification of same to the following counsel of record as follows:

Jeffrey A. Kershaw, Esq.  
R. Patrick White, Esq.  
Kershaw White, LLC  
5881 Glenridge Drive, Suite 100  
Atlanta, Georgia 30328

Respectfully submitted, this 18th day of January, 2023.

LUEDER, LARKIN & HUNTER LLC

/s/ Samuel H. Sabulis

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